

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

SEALED

CB
SDC - BALTIMORE
22 MAR 29 PM 2:38

UNITED STATES OF AMERICA

v.

MARK ROBERT UNKENHOLZ,

Defendant.

CRIMINAL NO.

JKB-22-105

UNDER SEAL

MOTION TO SEAL INDICTMENT

The United States of America, by its undersigned attorneys, moves this Honorable Court for an order sealing the Indictment and Arrest Warrant in the above-captioned matter.

The defendant has not been arrested and the United States plans to execute search and seizure warrants simultaneously with the arrest of the Defendant. Premature disclosure of the Indictment and Arrest Warrant might cause the defendant to depart the local area and/or destroy or discard evidence.

WHEREFORE, the government requests that this Motion, the Order, the Indictment, the Arrest Warrant, be **sealed** until further order of the Court, and that one (1) copy of the signed Indictment be provided by the Clerk to the United States Attorney's Office.

Respectfully submitted,

Erek L. Barron
United States Attorney

By: P. Michael Cunningham
P. Michael Cunningham
Assistant United States Attorney